

An Exelon Company

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September 18, 2017

Filed Via Delafile
Donna Nickerson
Secretary
Delaware Public Service Commission
861 Silver Lake Boulevard
Cannon Building, Suite 100
Dover, DE 19904

Docket No. 17-0978 – Application of Delmarva Power & Light Company for an Increase in Gas Base Rates – Response to Request for Supplemental Information

Dear Ms. Nickerson:

Re:

In response to DE PSC Staff's letter dated August 31, 2017 as well as the provisions of Ordering Paragraph No. 5 of Order No. 9109 in the above referenced docket, attached please find the supplemental information being provided by Delmarva Power pertaining to compliance with the Minimum Filing Requirements for its Application.

Should you have any questions, please contact Heather Hall at (302) 451-5323 or me at 302-429-3143.

Pamela J. Scott

Attachments

PSC Docket No. 17-0978

Company Responses to Minimum Filing Requirements Review

4.9 Materials and Supplies

4.9.3 Explain any unusual fluctuation for the period of time for which monthly balances are included.

Schedule 2E, Page 2 of 2 does not satisfy 4.9.3.

<u>Response:</u> Please see attached updated Schedule 2E, page 2 of 2 which now includes a footnote responsive to the requirements.

4.10 Investor Supplied Cash Working Capital

- 4.10.1 Complete Schedule 2E showing the components of investor supplied cash working capital included in the rate base claim.
- 4.10.2 Other items. If any other items are included in the working capital claim, provide a full and complete explanation in support thereof including the calculation which demonstrates the amounts so included as investor-provided funds with reference to 26 **Del.C.** §102(3).

Schedule 2E-1, it is not clear if this is "investor supplied cash working

<u>Response:</u> Please see attached updated Schedule 2E-1, page 1 of 2 which now includes a footnote responsive to the question raised.

4.11 Other Element of Property

capital."

4.11.3 If a rate base claim is made for property under construction but not used and useful in whole or part during the test period, provide a schedule showing each major project and indicate whether or not the project will add capacity or replace existing capacity or both. If major units of capacity are being added, show in calculation the additional revenue expected to be realized. If major units of capacity are being retired, indicate the type of property, its original cost, accumulated reserves for depreciation and the expected date of retirement from service.

Schedule 2F, Page 2 and 3. It has not been indicated whether or not the project will add capacity or replace existing capacity or both.

Response: The Company did not include in this filing a request for recovery of rate base for property under construction (Construction Work in Progress). Post test period reliability plant closings, which would be included in Construction Work in Progress prior to their respective closing to plant in service, are included in the Company's proposed revenue requirement. The amount included in Schedule 2F Pages 2 and 3 were not included in rate base.

5.0 Net Operating Income

5.2.5 If test period volumes of sales or tariff units are based on an estimate or forecast, provide a full and complete explanation of the basis and assumptions underlying such forecast, including weather assumptions and any price elasticity effects.

Schedule 5.2.5 and 5.2.6 does not satisfy 5.2.5.

<u>Response</u>: The Test Period volume of sales are not based on estimates or forecasts, rather, billing determinants are used. Please see attached updated Schedule 3A which shows information for 12 months ending May 2017.

6.0 Rate of Return

- 6.4 Common Equity Cost Rates
 - 6.4.3 Provided Comparative financial data on Schedules 4G and 4H for the test period without rate change increase for the test year, for the most recent calendar year and for the next most recent calendar year.

The Schedule 4G 4H provided only includes numbers for calendar year end 2014, 2015, and 2016.

Response: Forecasted financial data has been provided for the calendar year 2017. Please see attached updated schedule Sch 4-G 4-H 6.4.3.

8.0 Tariffs

8.2 By appropriate marginal designation, in the proposed Tariff Schedules, classify

proposed changes in accordance with code shown below:

- C Changed Regulation
- D Discontinued Rate or Regulation
- I Increased Rate
- N New Rate or Regulation
- R Reduced Rate
- S Reissued Matter
- T Change in Text without change in Rate or Regulation

The Proposed Tariff Schedules included in the application do not include any Marginal Designations.

Response: Please see attached containing marginal designations.

Delmarva Power & Light Company - Gas Delaware Materials & Supplies for the Test Period and Preceding 12 Months

(1)	(2)		(3)	(4)	(6)	(7)
		_	Test Year		Test Pe	eriod
			Gas	Materials	Gas	Materials
Line			in	&	in	&
<u>No.</u>	<u>Description</u>		Storage	Supplies	<u>Storage</u>	Supplies
1	Twelve Months Preceding	Test Period				
2	December, 2015					
3	January, 2016					
4	February					
5	March		\$1,023,061	\$3,884,242		
6	April		\$1,042,734	\$3,833,071		
7	May		\$1,137,291	\$4,409,870		
8	June		\$1,087,167	\$4,931,355		
9	July		\$1,013,234	\$6,032,868		
10	August		\$990,079	\$6,917,700		
11	September		\$1,032,863	\$7,806,789		
12	October		\$1,087,077	\$8,401,638		
13	November, 2016		\$1,096,888	\$8,255,989		
14				. ,,		
15	Test Period					
16	December, 2016	Actual	\$1,081,236	\$6,893,873	\$1,081,236	\$6,893,873
17	January, 2017	Actual	\$1,054,942	\$5,338,166	\$1,054,942	\$5,338,166
18	February	Actual	\$916,103	\$4,099,076	\$916,103	\$4,099,076
19	March	Actual	\$1,058,192	\$2,449,999	\$1,058,192	\$2,449,999
20	April	Forecast		, ,	\$931,157	\$2,985,866
21	May	Forecast			\$1,120,767	\$4,374,143
22	June	Forecast			\$1,100,000	\$4,400,000
23	July	Forecast			\$1,100,000	\$4,400,000
24	August	Forecast			\$1,100,000	\$4,400,000
25	September	Forecast			\$1,100,000	\$4,400,000
26	October	Forecast			\$1,100,000	\$4,400,000
27	November	Forecast			\$1,100,000	\$4,400,000
28	December, 2017	Forecast			\$1,100,000	\$4,400,000
29	13 month average		\$1,047,759	\$5,634,972	\$1,066,338	\$4,380,086

Note: Estimated balances are based on last actual balance available at time of filing. No unusual fluctuations in the monthly balances.

Updated Schedule No. 2-E1
Page 1 of 2
Ref: Part 4, Para. 10.1 & 10.2
Witness: Ziminsky

Delmarva Power & Light Company - Gas Delaware Jurisdictional Working Capital for the Test Period

(1)	(2)	(3)	(4)
Line <u>No.</u>	<u>Description</u>	Test Year <u>Balance</u>	Test Period <u>Balance</u>
1 2	Cash Working Capital	\$10,816,293	\$8,715,525
3	Miscellaneous Items (net of tax)		
4	Prepaid Pension Balance	\$15,123,562	\$14,440,344
5	Accrued OPEB Liability	(\$2,911,837)	(\$2,937,888)
6	AMI Regulatory Asset	\$5,220,321	\$4,921,255
7 8	Docket No 16-0650 Cost to Achieve	\$0	\$1,527,044
9 10	Total Miscellaneous Items	\$17,432,046	\$17,950,756
11	Total Cash Working Capital	\$28,248,339	\$26,666,281

Note: Cash working capital is all investor provided cash working capital.

Delmarva Power Company Sales and Revenue by Rate Class Delaware - Gas

Classification		RG	99	MVG	1,06	ថ	GVFT	MVFT	LVFT	LVG-QFCP	Core Sales Subtotal	MVIT	Nor	Non-Core Sales Sub- total	Retail Total	Control	Control Sheet Check
12 Months Ended 12/31/2014	014																
MCF Sales:		8,578,645	5,741,543	268,597		199	1,523,893	1,549,722	3,724,582	919,553	22,306,734	239,383	(1,536,788)	(1,297,405)	21,009,329		21,009,329
Base Booked Revenues	s. v	54,126,325 \$	19,909,564 \$	895,400	v. v	931 \$	3,339,618 \$	3,277,654 \$	3,558,976 \$	341,398 \$	85,449,866 \$	336,035 \$	53,897 \$	138,827 \$ (588.349) \$	85,588,692		87,431,825
Total Revenues	Ĭ	106,731,869	56,927,841	2,378,464		2,145	3,394,701	3,246,634	4,094,878	789,716	177,566,248	420,965	(870,487)	(449,523) \$	177,116,725	v	177,116,727
12 Months Ended 12/31/2015	015																
MCF Sales:		8,519,089	4,162,495	243,966		198	765,723	1,468,762	3,503,026	1,659,319	20,322,578	228,430	227,173	455,603	20,778,181		20,778,181
Base Booked Revenues Booked GCR Revenues	ν. ν.	55,152,450 \$	20,923,676 \$	936,312	ww	942 \$	2,742,952 \$	3,445,014 \$	3,573,653 \$ 968,854 \$	601,882 \$	87,376,881 \$	81,881 \$	50,107	131,988 \$	87,508,869		87,508,869 \$74,521,568
Total Revenues	S	99,443,649 \$	43,486,843 \$	1,167,036	·	2,010 \$	2,742,952 \$	3,445,014 \$	4,542,507 \$	7,068,439 \$	161,898,449 \$	81,881 \$	50,107	131,988 \$	162,030,437	v	162,030,437
12 Months Ended 12/31/2016	910																
MCF Sales:		7,362,238	3,597,248	210,837	655'5	171	661,742	1,269,311	3,021,773	1,433,991	17,562,870	197,410	196,324	393,734	17,956,604		17,956,604
Base Booked Revenues Booked GCR Revenues	w w	51,707,575 \$	19,616,763 \$	877,829 \$	46,713 \$	884 \$	2,571,624 \$	3,229,835 \$	3,303,726 \$ 555,074 \$	564,288 \$	81,919,237 \$	\$ 76,767 \$	46,977 \$	123,744 \$	82,042,981 48,331,798	ww	82,042,981 48,331,798
Total Revenues	s	80,433,128 \$	34,250,358 \$	1,027,468 \$	120,000 \$	1,576 \$	2,571,624 \$	3,229,835 \$	3,858,800 \$	4,758,246 \$	130,251,035 \$	\$ 191,91	46,977 \$	123,744 \$	130,374,779	vs	130,374,779
Test Year 12 Months Ended 5/31/2017	15/31/20	117															
MCF Sales:		73,254,892 \$	36,324,236 \$	2,064,843	122,300	1,980	7,037,560	13,740,920	37,330,590	16,579,360	186,456,681	2,736,260	2,915,170	5,651,430	192,108,111		192,108,130
Base Booked Revenues	us 17	55,916,946	19,312,476	921,049	103,673	1,017	2,861,683	3,466,682	5,030,634	608,443	88,222,603	504,475	292,024	796,499	89,019,102		89,019,102
Total Revenues			35,238,693 \$	1,820,120	154,346	1,859	3,026,384	3,700,173	5,823,104	4,594,572	142,692,392	533,805	345,330	879,135	143,571,527		143,571,527

Delmarva Power & Light Company Comparative Financial Data - General

Line#	Description	Budget 12/31/2017	Actual 12/31/2016	Actual 12/31/2015	Actual 12/31/2014
	1 Embedded Cost - Long-Term Debt	3.80%*	3.83%	3.85%	3.90%
	2 Embedded Cost - Preferred Stock	N/A	N/A	N/A	N/A
	3 Pretax Interest Coverage	4.10	1.20	3.31	4.19
	4 Pretax Interest Coverage - Before AFUDC	3.82	1.17	3.24	4.09
	5 After Tax Interest Coverage	2.94	0.82	2.41	2.96
	6 After Tax Interest Coverage - Before AFUDC	2.96	0.81	2.38	2.93
	7 Ratio of Earnings to Fixed Charges	4.10	1.20	3.30	4.20
	8 Ratio of Earnings to Fixed Charges and Preferred Dividends	4.10	1.20	3.30	4.20
	9 After Tax Interest & Preferred Dividend Coverage	2.94	0.82	2.41	2.96
	10 After Tax Interest & Preferred Dividend Coverage, Before AFUDC	2.96	0.81	2.38	2.93
	11 S&P Bond Rating - Senior Secured Debt	NF*	Α	Α	Α
	12 Moody's Bond Rating - Senior Secured Debt	NF*	A2	A2	A2
	13 S&P Preferred Stock Rating	NR*	NR*	NR*	NR*
	14 Moody's Preferred Stock Rating	NR*	NR*	NR*	NR*
	15 Rate of Return on Total Capital	8.29%	6.71%	6.71%	8.85%
	16 Percentage of Revenues - Electric	88.00%	88.00%	87.50%	85.00%
	17 Percentage of Revenues - Gas	12.00%	12.00%	12.50%	15.00%
	18 Percentage of Revenues - Other	0.00%	0.00%	0.00%	0.00%

^{*} June 30, 2017 Embedded Cost of Debt

NF - Not Forecasted

NR - Not Rated

Delmarva Power & Light Company

PSC Docket No. 17-0978

Updated Minimum Filing Requirements

Part 8, Section 8.2

8.0 Rates and Tariffs

- By appropriate marginal designation, in the proposed Tariff Schedules, classify proposed changes in accordance with code shown below:
 - C Changed Regulation
 - D Discontinued Rate or Regulation
 - I Increased Rate
 - N New Rate or Regulation
 - R Reduced Rate
 - S Reissued Matter
 - T Change in text without change in rate or regulation

See Attached

Leaf No.: 37

Delmarva Power & Light Company

P.S.C. Del. No. 5 - Gas

Revision: Sixty-ninthSeventieth Revised: June 15 August 17, 2017

RATES AND CHARGES

CORE SALES RATE LEAF

SERVICE CLASSIFICATION	BASE RATE	BASIS	
Residential Gas Sales Service ("RG")			
Customer Charge	\$ 12.65 14.49	per month	\mathcal{I}
Delivery Charge	\$0. 52721 60082	per CCF	
Space Heating Delivery Charge 1/			I
Over 50 CCF	\$0. 42305 48926	per CCF	I
Environmental Surcharge Rider	\$0.00169	per CCF	
Gas Cost Rate (GCR)	\$0.44995	per CCF	
General Gas Sales Service ("GG")		•	
Customer Charge	\$ 52.08 61.58	per month	I
Delivery Charge		•	
First 750 CCF	\$0. 34824 37819	per CCF	I
Over 750 CCF	\$0.3482437819	per CCF	T
Environmental Surcharge Rider	\$0.00169	per CCF	
Gas Cost Rate (GCR)	\$0.44995	per CCF	
Gas Lighting Sales Service ("GL")		•	
(Estimated Usage - 15 CCF per month)			
Monthly Charge	\$ -7.48 8.32	per gas light	I
Gas Cost Rate (GCR)	\$ 6.75	per gas light	
Medium Volume Gas Sales Service ("MVG	<u>")</u>		
Customer Charge	\$ 785.71 922.97	per month	I
Demand Charge	\$ 17.060 20.472	per MCF of Billing MDQ	I
Delivery Charge 2/	\$0. 53073 43246	per MCF	I
Environmental Surcharge Rider	\$0.01686	per MCF	
Gas Cost Rate (GCR)	\$4.4995	per MCF	
Large Volume Gas Sales Service ("LVG")			
Customer Charge	\$1, 146.62 245.19	per month	I I
Demand Charge	\$ 10.461 12.136	per MCF of Billing MDQ	I
Delivery Charge 2/	\$0. 13539 17615	per MCF	工
Environmental Surcharge Rider	\$0.01686	per MCF	
Gas Demand Cost Rate(DCR)	\$1.7148	per MCF	
Gas Commodity Cost Rate (CCR) 2/	Varies	per MCF	

<u>Public Utilities Tax:</u> 4.25% applies to all non-residential services, including the GCR, unless pursuant to Title 30 Chapter 55, the Customer is eligible for a different tax rate or is exempt from such tax.

<u>City of Wilmington Local Franchise Tax</u>: 2% Charged on all non-exempt services, in the City of Wilmington, including the GCR.

Utility Facility Relocation Charge

For applicability refer to Rider UFRC on Leaf No. 81

1/ Gas used by Customers with permanently installed gas-fired space heating equipment qualifies for the space heating delivery rate for all gas used in excess of 50 CCF for the billing months of October through May, inclusive.

All LVG and "Electing" MVG Customers pay a monthly Gas Demand Cost Rate and a Commodity Cost Rate based upon the system Weighted Average Commodity Cost of Gas ("System WACCOG"). "Non-Electing" MVG Customers pay the annual GCR listed here.

Order No. 9049

Filed: June 15 August 17, 2017

Docket No.-16-0650

Effective with Usage On and After July November 1, 2017

Filed in Compliance with Commission Order No. 9049 in Docket No. 16-0650

Full Proposed

Leaf No.: 37a

Delmarva Power & Light Company P.S.C. Del. No. 5 – Gas

Revision: Twentieth Twenty-first Revised: June 15 August 17, 2017

RATES AND CHARGES CORE SALES RATE LEAF

SERVICE CLASSIFICATION

BASE RATE

BASIS

<u>Large Volume Gas Sales Service-Qualified Fuel Cell Provider-Renewable Capable Power Production</u> ("LVG-QFCP-RC")

Customer Charge \$1,221.62320.19 per month

Demand Charge \$7.290338.45891 per MCF of Billing MDQ

Capital Recovery Charge Varies per Customer's Executed Service

Agreement

Pressure Support Fee \$0.1944 per MCF Redelivered

Balancing Fee \$0.5897 per MCF of Imbalance Volumes

Environmental Surcharge Rider \$0.01686 per MCF Gas Cost Rate (GCR) Commodity Charge 1/ Varies per MCF

<u>Public Utilities Tax:</u> 4.25% applies to all non-residential services, unless pursuant to Title 30 Chapter 55, the Customer is eligible for a different tax rate or is exempt from such tax.

<u>City of Wilmington Local Franchise Tax</u>: 2% charged on all non-exempt services, in the City of Wilmington.

Utility Facility Relocation Charge

For applicability refer to Rider UFRC on Leaf No. 81

1/ All LVG-QFCP-RC customers pay a Commodity Charge Rate based upon the Gas Daily Average (GDA) for Transco Zone 6 Non-New York North price plus any premiums incurred by the Company to provide this service.

P.S.C. Del. No. 5 – Gas

Revision: Sixty-fifthsixth

Revised: June 15 August 17, 2017

RATES AND CHARGES

CORE TRANSPORTATION RATE LEAF

SERVICE CLASSIFICATION	BASE RATE	BASIS	
General Volume Firm Transportation Service ("GVFT")			
Customer Charge	\$181.47	per month	
Delivery Charge		F	
First 750 CCF	\$0.3482437819	per CCF Redelivered	I
Over 750 CCF	\$0.3482437819	per CCF Redelivered	Z
Pressure Support Fee	\$0.01944	per CCF Redelivered	
Balancing Fee Non-Base Rate	\$0.05897	per CCF of Imbalance Volumes	
Environmental Surcharge Rider	\$0.00169	per CCF	
Medium Volume Firm Transportation Service ("MVFT")			
Customer Charge	\$ 860.71 997 . 97	per month	I
Demand Charge	\$ 17.060 20.472	per MCF of Billing MDQ	
Delivery Charge	\$0.5307343246	per MCF Redelivered	
Pressure Support Fee	\$0.1944	per MCF Redelivered	
Balancing Fee Non-Base Rate	\$0.5897	per MCF of Imbalance Volumes	
Environmental Surcharge Rider	\$0.01686	per MCF	
Large Volume Firm Transportation Service ("LVFT")			
Customer Charge	\$1, 221.62 320.19	per month	-
Demand Charge	\$ 10.461 12.136	per MCF of Billing MDQ	五五
Delivery Charge	\$-0. 13539 <u>17615</u>	per MCF Redelivered	
Pressure Support Fee	\$0.1944	per MCF Redelivered	7
Balancing Fee Non-Base Rate	\$0.5897	per MCF of Imbalance Volumes	
Environmental Surcharge Rider	\$0.01686	per MCF	
Standby Service ("SBS")			
Demand Charge Non-Base Rate	\$1.7148	per MCF	
Commodity Charge	Φ1./170	Monthly System WACCOG per MCF	
Village		(adjusted for Lost and Unaccounted for Gas)	

Utility Facility Relocation Charge

For applicability refer to Rider UFRC on Leaf No. 81

Public Utilities Tax: 4.25% Applies to all non-residential services, including the GCR, unless pursuant to Title30 Chapter 55, the Customer is eligible for a different tax rate or is exempt from such tax.

City of Wilmington Local Franchise Tax: 2.00% Charged on all non-exempt Services, in the City of Wilmington, including the GCR.

Order No. 9049 Docket No. 16-0650 Filed: June 15Filed: August 17, 2017

Effective with Usage On and After JulyNovember 1, 2017

Revision: Thirty ninthFortieth

Leaf No.: 39

Revised: June 15 August 17, 2017

RATES AND CHARGES NON-CORE RATE LEAF

	NON-C	ORE RATE	<u>LEAF</u>		
SERVICE CLASSIFICATION	BASE <u>RATE</u>	MIN RATE	MAX <u>RATE</u>	NON-BASE <u>RATE</u>	BASIS
Flexibly Priced Gas Service ("FPS") Commodity Charge 1/ No Notice Swing Charge	\$ 0.15000	Varies	N/A		per MCF per MCF Redelivered
Medium Volume Interruptible Trans Customer Charge Delivery Charge (2)	servi \$860.71997.		!		per month
Option 1 Option 2 Option 3 Balancing Fee	\$ 1.30000 Negotiable	\$0.01	\$3.27	\$0.5897	per MCF Redelivered per MCF Redelivered per MCF Redelivered per MCF of Imbalance Volumes
Large Volume Interruptible Transpor Customer Charge Delivery Charge (2) Option 1	tation Service \$1, 221.62 32				per month
First 5,000 MCF Over 5,000 MCF Option 2 Option 3 Balancing Fee	\$ 1.30000 \$ 0.36000 Negotiable	\$0.01	\$1.00	\$0.5897	per MCF Redelivered per MCF Redelivered per MCF Redelivered per MCF Redelivered per MCF of Imbalance Volumes
Quasi-Firm Transportation Service (*Customer Charge Demand Charge Delivery Charge (2) Balancing Fee	'OFT'') Negotiable Negotiable Negotiable			\$0.5897	per Month per MCF of MDQ per MCF Redelivered per MCF of Imbalance Volumes

Public Utilities Tax

4.25% applies to all non-residential services, including the GCR, unless pursuant to Title 30 Chapter 55, the Customer is eligible for a different tax rate or is exempt from such tax.

<u>City of Wilmington Local Franchise Tax:</u> 2.00% Charged on all non-exempt services, in the City of Wilmington, including the GCR

Utility Facility Relocation Charge

For applicability refer to Rider UFRC on Leaf No. 81

1/ Minimum Rate is the monthly system WACCOG plus Lost and Unaccounted for Gas, unless gas is acquired specifically for, plus \$0.01 per Mcf.

2/ Minimum and maximum rates do not include the applicable \$0.00000/Mcf charge on QFT, MVIT and LVIT.

Order No. 9049

Filed: June 15 Filed: August 17, 2017

Docket No. 16-0650

Effective with Usage On and After JulyNovember 1, 2017

Filed in Compliance with Commission Order No. 9049 in Docket No. 16-0650 Full Proposed